

Association of
State Democratic
Chairs



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2001 OCT 25 P 2:39

Joe Carmichael
President

October 19, 2001

Mr. Scott Walker
Reports Analyst
Report Analysis Division
Federal Election Commission
Washington, DC 20465

Re: ASDC Federal Operating Account (C00259481)
October Quarterly Report (7/1/00-9/30/00)
30 Day Post-General Election Report (10/1/00-11/27/00)
Year-End Report (11/28/00-12/31/00)

Dear Mr. Walker:

I am writing in reference to your letters of October 17, 2001, regarding the three above-mentioned reports.

Transfers from State Committees. You requested clarifying information regarding transfers from a number of state Democratic committees which had not been disclosed on their reports of receipts and disbursements.

Each of the transfers is a contribution from an affiliated committee. It is our understanding that these contributions came from federally permissible funds from these committees. We will work with the relevant state committees to ensure they amend their reports to reflect the disbursement of these contributions.

Non-Federal Transfer. Your letter about our October Quarterly Report requested a clarification on a discrepancy between a Line 18, Column A transfer of non-federal funds to our federal account for joint activity, and a Line 21 (a)(ii) expenditure of non-federal funds for joint activity.

The difference between the amounts, which equals \$5,199.31, represents a transfer of non-federal funds made to our federal account on August 21, 2000, and reflected on page 1 of our Schedule H3. These funds represent the non-federal share of payments to vendors made between June 22 and June 29, 2000, within the 60-day window after payment to the vendor in which non-federal transfers can be made.

The change in designation for the June 22-29 expenditures from being line 21 (b) "Other Federal Operating Expenditures" to being line 21 (a) "Shared Federal/Non-Federal Activity" was reported in an amendment to our June Quarterly Report, which we filed on October 4, 2000.

If you have any questions about these or other matters, please feel free to contact me or my Director of Operations, Andrew Goldberg, at (202) 479-5121.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Fishman". The signature is fluid and cursive, with a large initial "A" and a long, sweeping underline.

Ann Fishman
Executive Director



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Ann Fishman, Treasurer
Association of State Democratic Chairs
Federal Operating Account
430 South Capitol Street SE
Washington, DC 20003

OCT 17 2001

Identification Number: C00259481

Reference: October Quarterly Report (7/1/00-9/30/00)

Dear Ms. Fishman:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-A review of the reports filed by your committee (pertinent portion(s) attached) indicates that your committee received a transfer(s) from Democratic State Central Committee of California - Federal, Connecticut Democratic State Central Committee, Nevada State Democratic Party, New Hampshire Democratic State Committee, and Democratic State Central Committee Delaware which has not been disclosed on their report(s) of receipts and disbursements. Please provide clarifying information regarding the source of the transfer(s) received by your committee.

-The Detailed Summary Page, on Line 18 Column A of your report, discloses \$34,192.69 in transfers from the non-federal account for joint activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$28,993.38 as the non-federal share for joint activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for shared activity, transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the

non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott Walker', written over a horizontal line.

Scott Walker
Reports Analyst
Report Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Ann Fishman, Treasurer
Association of State Democratic Chairs
Federal Operating Account
430 South Capitol Street SE
Washington, DC 20003

OCT 17 2001

Identification Number: C00259481

Reference: 30 Day Post-General Report (10/19/00-11/27/00)

Dear Ms. Fishman:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-A review of the reports filed by your committee (pertinent portion(s) attached) indicates that your committee received a transfer(s) from Pennsylvania Democratic Party, Democratic State Committee Delaware, Colorado Democratic Party, and Arizona State Democratic Central Executive Committee which has not been disclosed on their report(s) of receipts and disbursements. Please provide clarifying information regarding the source of the transfer(s) received by your committee.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Scott Walker
Reports Analyst
Report Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Ann Fishman, Treasurer
Association of State Democratic Chairs
Federal Operating Account
430 South Capitol Street SE
Washington, DC 20003

Identification Number: C00259481

OCT 17 2001

Reference: Year End Report (11/28/00-12/31/00)

Dear Ms. Fishman:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-A review of the reports filed by your committee (pertinent portion(s) attached) indicates that your committee received a transfer(s) from New Jersey Democratic State Committee, Democratic State Central Committee of California - Federal, Nevada State Democratic Party, New Hampshire Democratic State Committee, and Connecticut Democratic State Central Committee which has not been disclosed on their report(s) of receipts and disbursements. Please provide clarifying information regarding the source of the transfer(s) received by your committee.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Scott Walker
Reports Analyst
Report Analysis Division

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
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The Commission has added this page to the end of this filing to indicate how it was received.

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